

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

HEWLETT-PACKARD COMPANY, and
HEWLETT-PACKARD
DEVELOPMENT COMPANY, L.P.,

Plaintiffs,

v.

ICL NETWORK SOLUTIONS (HK),
LIMITED, and C2C TECHNOLOGY,
INCORPORATED,

Defendants.

Civil Action No. 05-40153 FDS

**SCHEDULING CONFERENCE STATEMENT OF PLAINTIFFS
HEWLETT-PACKARD COMPANY AND HEWLETT-PACKARD
DEVELOPMENT COMPANY, L.P.**

Plaintiffs Hewlett-Packard Company and Hewlett-Packard Development Company, L.P. (collectively, "Plaintiffs") submit this Scheduling Conference Report ("Report"). Because Plaintiffs and Defendant C2C Technology, Incorporated ("C2C") entered into a settlement agreement resolving this action as between them in December 2005, C2C's input has not been sought for this Report. Counsel for Defendant ICL Network Solutions (HK) Limited ("ICLNS") was not able to participate in the substance of this Report as instructions have not been received from the company in Hong Kong.

PROPOSED DISCOVERY AND MOTIONS SCHEDULE

Plaintiffs propose the following pre-trial schedule.

A. Proposed Discovery.

Written Discovery: Plaintiffs and ICLNS ("Parties") will serve written discovery as soon as allowed by Fed. R. Civ. P.

Depositions: The Parties will notice depositions so that they occur as soon as practicable.

Fact and Expert Discovery Cut-Off: September 15, 2006. This cut-off requires that written discovery be served in time for responses to be due on or before this date, and that fact and expert depositions be concluded on or before this date.

Expert Disclosures: Expert disclosures will be exchanged by August 21, 2006.

B. Law And Motion.

Last Date to Amend Pleadings or Add Parties: May 31, 2006

Dispositive Motion Cut-Off: October 13, 2006.

PARTY AND ATTORNEY CERTIFICATION

Plaintiffs and their counsel hereby affirm that they have conferred (a) with a view to establishing a budget for the costs of conducting the full course—and various alternative

courses—of litigation; and (2) to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

SIGNED: April ____, 2006.

April 7, 2006.

HEWLETT-PACKARD COMPANY and
HEWLETT-PACKARD DEVELOPMENT
COMPANY, L.P.

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Dated: April 7, 2006

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